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23 LYNETTE FLIEGELMAN

24
25 **UNITED STATES DISTRICT COURT**
26
27 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
28

29 LYNETTE FLIEGELMAN, on behalf
30 of herself and all others similarly
31 situated,

32 Plaintiffs,

33 v.

34 THE TALBOTS, INC. and DOES 1
35 through 100, inclusive,

36 Defendants.

CASE NO. 2:17-cv-4576 DMG (JCx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

Complaint Served: 05/22/17
Current Pleading Date: 07/28/17
New Pleading Date: 08/28/17

1 Plaintiff LYNETTE FLIEGELMAN (“Plaintiff”) and Defendant THE
2 TALBOTS, INC. (“Talbots” or “Defendant”), by and through their respective
3 counsel, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed a putative consumer class action Complaint
5 against Defendant on May 17, 2017 in Ventura County Superior Court;

6 WHEREAS, Defendant removed the action to this Court on June 21, 2017;

7 WHEREAS, under Federal Rule of Civil Procedure 81, Defendant’s current
8 deadline to respond to the Complaint is July 28, 2017;

9 WHEREAS, the Parties have been meeting and conferring as to the
10 allegations in the Complaint and arguments that Defendant may raise in a motion to
11 dismiss. Moreover, more time is needed to investigate and gather information in
12 light of the scope and seriousness of the class action allegations set forth in the
13 Complaint. Accordingly, both Parties agree that Defendant’s response deadline
14 should be pushed back, so that they are able to continue their discussions before
15 entering into motion practice;

16 WHEREAS, on June 26, 2017, the Parties filed a stipulation to extend
17 Defendant’s time to respond by not more than thirty (30) days, pursuant to Local
18 Rule 8-3. No other extensions have been requested in this case;

19 WHEREAS, this requested extension will not alter the date of any event or
20 any deadline already fixed by Court order;

21 THEREFORE, IT IS HEREBY AGREED AND STIPULATED, that
22 Defendant’s deadline to respond to Plaintiff’s Complaint shall be extended until
23 August 28, 2017.

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1 **IT IS SO STIPULATED.**

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3 DATED: July 21, 2017 SEDGWICK LLP

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5 By: /s/ Stephanie Sheridan *
6 STEPHANIE A. SHERIDAN
7 ANTHONY J. ANSCOMBE
8 MEEGAN B. BROOKS
9 Attorneys for Defendant
 THE TALBOTS, INC.

10 DATED: July 21, 2017 LAW OFFICES OF ZEV B. ZYSMAN

11
12 By: /s/ Zev B. Zysman
13 ZEV B. ZYSMAN
14 Attorneys for Plaintiff
15 LYNETTE FLIEGELMAN

16 *I attest that Plaintiff's counsel Zev Zysman concurs in this filing's content and has
17 authorized the filing.
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